

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**MICHAEL OLIVER,**

**Plaintiff,**

**CASE NO. 20-cv-12711**

**HON. LAURIE J MICHELSON**

**v.**

**DONALD BUSSA, In his  
individual and official capacity,  
and CITY OF DETROIT,  
Jointly and Severally,**

**Defendants,**

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**DAVID A. ROBINSON (P 38754)**  
**ROBINSON & ASSOCIATES, P.C.**  
Attorney for Plaintiff  
28145 Greenfield Rd., Suite 100  
Southfield, MI 48076  
(248) 423-7234  
[davidrobinsonlaw@gmail.com](mailto:davidrobinsonlaw@gmail.com)

**THOMAS E. KUHN (P37924)**  
Co-Counsel for Plaintiff  
615 Griswold Street, Ste. 515  
Detroit, MI 48226  
313.974-6605; fax 313.963.9061  
[tekuhn@aol.com](mailto:tekuhn@aol.com)

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**AUDREY J. FORBUSH (P41744)**  
**PLUNKETT COONEY**  
Attorney for Defendant Stephen Cassini  
Plaza One Financial Center  
111 E. Court Street-Suite 1B  
Flint, MI 48502  
(810) 342-7014/232-3159 Fax  
[afortbush@plunkettcooney.com](mailto:afortbush@plunkettcooney.com)

**PATRICK M CUNNINGHAM**  
**(P67643)**  
City of Detroit Law Department  
Attorneys for Defendant City of Detroit  
2 Woodward Avenue, Suite 500  
Detroit, MI 48226  
(313) 237-5032  
[cunninghamp@detroitmi.gov](mailto:cunninghamp@detroitmi.gov)

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**PLAINTIFF'S PRELIMINARY WITNESS LIST**

Plaintiff, Michael Oliver, by and through her attorney ROBINSON & ASSOCIATES, P.C.,  
submits this, her preliminary witness list, as follows:

1. Michael Oliver, Plaintiff

2. Rockim Oliver, c/o Plaintiff's counsel
3. Lashawnteria Burton, c/o Plaintiff's counsel
4. Takeilla Washington, c/o Plaintiff's counsel
5. Stephen Cassini, Defendant
6. Donald Bussa, Defendant
7. Brian Surma, Wayne County Prosecutor
8. Patrick Nyenhuis, Criminal Defense Attorney
9. Ms. Andrea Ford-Ayler, Principal
10. Ms. Lenora Crawford, Assistant Principal
11. Andre Jackson, Fact Witness
12. Employees of Dataworks Plus
13. Detroit Police Department, including any and all law enforcement personnel with knowledge regarding this matter, including officers, investigators, assistants, records custodians, supervisors, and accident reconstructionist including and not limited to the following:

- a. Joseph Dabliz
- b. Stevie Posey
- c. Christopher Potts
- d. Russell McIntosh
- e. J. L. Morgan
- f. T. Ahmed
- g. L.D. Peacock
- h. J.F. Bradford
- i. D.D. Bellamy
- j. C. Irvin
- k. Larry Campbell
- l. Uriah Sufana

- m. Martin Lawrence
- n. Art Thompson
- o. Aric Tosqui
- p. Stamatia Tsakos
- q. Jack Fennessey

14. Ferndale Police Department, including any and all law enforcement personnel with knowledge regarding this matter, including officers, investigators, assistants, records custodians, supervisors, and accident reconstructionist.

15. Records of custodians for the following:

- Michigan State Police
- Michigan Department of Corrections
- Wayne County Prosecutor's Office
- Michael Kazyak, Wayne County Prosecutor's Office
- Federal Bureau of Investigation

16. Any and all witnesses, including expert witnesses, identified on Defendant's witness list including but not limited to the following:

- Richard Jackson, M.D. or another suitable expert in psychiatry
- Calmeze Dudley, M.D. or another suitable expert in psychiatry
- Jeffrey Kezlarian, M.D. or another suitable expert in psychiatry
- Craig Lemmen, M.D. or another suitable expert in psychiatry
- Mauricio Kohn, Ph.D. or another suitable expert in psychiatry
- Elizabeth Pasikowski or another suitable expert in vocational rehabilitation

17. Any and all rebuttal witnesses.

18. Any and all witnesses discovered through the course of discovery.

19. All witnesses listed in answers to interrogatories, depositions, request for admissions, and other pleadings filed in the course of this action.

20. Plaintiff reserves the rights to name any and all doctors, medical personnel, or therapists seen by Plaintiff, as expert/treaters.
21. Dr. Michael Abramsky, psychologist expert, Old Woodward, Birmingham, MI
22. All witness listed or called by any other party.
23. All witnesses not yet identified, but whose importance or necessity to this litigation is revealed later in the pendency of this case.
24. All witnesses necessary for laying the foundation for the introduction of documents.
25. All witnesses necessary to lay the foundation for the admissions of evidence.
26. Plaintiff reserves the right to amend or supplement this witness list at any time prior to trial with notice to the Court and the Parties.

Dated: April 21, 2021

Respectfully submitted,  
ROBINSON & ASSOC., P.C.

/s/ David A. Robinson  
David A. Robinson (P38754)  
Brandon McNeal (P81300)  
Attorney for Plaintiff

### **PROOF OF SERVICE**

I, Cheryl Watson, undersigned hereby affirm that on **April 21, 2021**, a copy of the ***Plaintiff's Preliminary Witness List*** and this proof of service were served upon the attorney(s) of record via the Wayne County e-serve system, which will generate electronic notification to all parties.

/s/Cheryl Watson  
Cheryl Watson